

MAGISTRATE JUDGE MICHELLE L. PETERSON
CHIEF DISTRICT COURT JUDGE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR19-124-RSM-MLP
)	
Plaintiff,)	
)	DEFENDANT'S MOTION TO
v.)	MODIFY BOND
)	
MICHELLE RENEE HUGHES,)	
)	Noted for November 15, 2019
Defendant.)	

Michelle Hughes, through counsel, moves the Court for an order modifying the conditions of release to remove the electronic component of Hughes' bond. The Pretrial Services and Probation Office, through Officer Ben Beetham, does not oppose this request. Assistant United States Attorney Angelica Williams opposes this request.

The Government charged Hughes by Complaint with making false statements and aggravated identity theft. Hughes was arrested on June 13, 2019, and made an initial appearance on that same day. The Court released Hughes on an appearance bond on July 1, 2019, subject to numerous conditions, including the requirement that Hughes undergo a mental health evaluation and participate in treatment as directed; that Hughes not use or have access to any computers; and that Hughes be subject to the Stand Alone Monitoring component of the Location Monitoring Program. Dkt. 11.

In the four months since, Hughes has continued to live in the same apartment, has maintained employment, has sought mental health treatment, and has otherwise

1 complied with all of the conditions of the bond. Hughes has very limited resources, and
2 spends little time outside of the home except for work and treatment. Over the past four
3 months, Hughes has demonstrated a commitment to complying with the bond
4 conditions. Because the location monitoring condition is not necessary to verify
5 compliance, the defense respectfully asks that the Court remove the Stand Alone
6 Monitoring condition.

7 DATED this 1st day of November 2019.

8 Respectfully submitted,

9 *s/ Corey Endo*

10 Assistant Federal Public Defender

11 Attorney for Michelle Hughes
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1 **CERTIFICATE OF SERVICE**

2 I certify that on November 1, 2019, I electronically filed the foregoing document
3 with the Clerk of the Court using the CM/ECF system, which will send notification of
4 filing to all registered parties.

5 s/ *Suzie Strait*
6 Paralegal
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